

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JOSEPH JACKSON,)	
)	18 CV 3007 (JS) (GRB)
Plaintiff,)	
)	
-against-)	
)	
NASSAU COUNTY, et al.)	
)	
Defendants.)	

PLAINTIFF'S DEMAND FOR VERIFIED INTERROGATORY
RESPONSES FROM DEFENDANT MELENDEZ

Pursuant to Rules 26.3, 26.4 and 26.5 of the Local Rules of the United States District Court for the Eastern District of New York (the "Local Rules") and Rules 30(b)(6) and 33 of the Federal Rules of Civil Procedure, plaintiff requests that defendant Melendez answer, under oath, within thirty days, the following interrogatories.

Alongside the Local Rules, these requests are to be construed in accordance with the Elefterakis, Elefterakis & Panek Uniform Definitions and Instructions for Interrogatories and Discovery Demands dated November 28, 2018, incorporated by reference herein and available at <https://bit.ly/2Xc76mR>. In the event that you fail to respond without reasonable grounds, plaintiff reserves the right to petition the court to overrule any objection, compel a response and award expenses incurred in connection with the motion.

1. Does your handwriting appear anywhere within the following Bates stamp ranges?

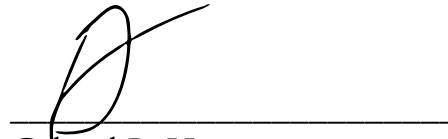
County 705-708; 741-742; (743-754); (755-786); 789-796; 797-798; 1024-1027; 1118-19; 1122-23; 1124-25; 1635-1638; 1639-1674; 2013-2024; 2039-2052; 2108-2127; 2136-37; 2160; 2168-2200; 2263-64; 2265-66; 2392-94; 2396-97; 2402; 2441-2445; 2446-2449; 2455-2465; 2467; 2469; 2471-2486; 2535; 2537-45; 2546-2622; 2623-2625; 2626-34; 2635-2636; 2638-2650; 2651-53; 2654-57; 2658-73; 2674-91; 2692-97; 2698-2719; 2757-59; 3030-3042; 3044; 3045-3074; 3075-3083; 3114-3128; 3153-54; 3165-67; 3475-3506; 3539-50; 3660-63; 3666-74; 3694; 3727-55; 3883-84; 3931-41; 4147; 4266-4630; 4656-67; 4668-75; 4709-12; 4713-4749; 4814-35; 4836-58; 4859-4910; 4911-5000; 5001-5006; 5029-37; 5038-43; 5044-46; 5083-91; 5092-5109; 5134-5135; 5141-5163; 5178-5192; 5248-49; 5250-54; 5267-5279; 5285-5303; 5304-5330; 5539-5540; 5611-5615; 5686-5738; 5739-5742; 5745-5790; 5794-5799; 5800-5803; 5804-5889; 5908-5957; 5958-5964; 5965-5991; 5992-6003; 6004-6032; 6033-6066; 6167-6269; 6418-6420; 6431-6437; 6438-6440; 6450-6460; 6465-6473; 6474-6485; and 6486-6508.

2. If the answer to Interrogatory No. 1 is yes, for each instance of your handwriting, identify:
 - a. The Bates number of the page on which your handwriting appears; and
 - b. Where on the page your handwriting appears.
3. Did you provide any documents or records to the Nassau County District Attorney's office, either directly or indirectly, in connection with the Steven Jason homicide investigation?
4. If the answer to Interrogatory No. 3 is yes, for each document or record identify:
 - a. The document or record;
 - b. The date(s) on which it was provided;
 - c. The recipient(s); and
 - d. Any documentary evidence or record of the conveyance.
5. Have you ever spoken to Glenn Montes or Maurice Larrea?
6. If the answer to Interrogatory No. 5 is yes, identify:

- a. The date(s);
 - b. The sum and substance of the conversation(s);
 - c. Any notes, recording or other documentation of the conversation.
7. Did you take any steps to obtain or preserve records related to Maurice Larrea's call to 911 on Mach 20, 1994? If so, describe them.
8. On how many occasions have you been sued? For each lawsuit in which you have been sued, please provide:
 - a. Docket number;
 - b. Venue;
 - c. Status;
 - d. Outcome, including amount of any judgment; and
 - e. Your personal contribution, if any, to any judgment or settlement.

Dated: January 14, 2020
New York, New York

ELEFTERAKIS, ELEFTERAKIS & PANEK



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